DEPUTY

1 2 FILED 3 CLERK, U.S. DISTRICT COURT 11/9/2022 4 CENTRAL DISTRICT OF CALIFORNIA 5 RAM 6 7 8 UNITED STATES DISTRICT COURT 9 FOR THE CENTRAL DISTRICT OF CALIFORNIA 10 April 2022 Grand Jury 11 UNITED STATES OF AMERICA, ED CR No. 22-00257-SSS 12 Plaintiff, I N D I C T M E N T 13 v. [18 U.S.C. § 844(i): Arson of Vehicles and Property Used in 14 VIOREL PRICOP, Interstate and Foreign Commerce and Used in Activities Affecting 15 Defendant. Interstate and Foreign Commerce] 16 17 The Grand Jury charges: 18 COUNT ONE 19 [18 U.S.C. § 844(i)] 20 On or about December 6, 2021, in San Bernardino County, within 21 the Central District of California, defendant VIOREL PRICOP 22 maliciously damaged and destroyed, by means of fire, a vehicle and 23 other personal property used in interstate and foreign commerce, and 24 used in an activity affecting interstate and foreign commerce, 25 namely, a trailer owned by Swift Transportation bearing trailer 26 number SWFZ131860 and the cargo therein.

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COUNT TWO

[18 U.S.C. § 844(i)]

On or about February 9, 2022, in San Bernardino County, within the Central District of California, defendant VIOREL PRICOP maliciously damaged and destroyed, by means of fire, a vehicle and other personal property used in interstate and foreign commerce, and used in an activity affecting interstate and foreign commerce, namely, a trailer owned by Swift Transportation bearing trailer number SWFZ134589 and the cargo therein.

COUNT THREE

[18 U.S.C. § 844(i)]

On or about February 28, 2022, in San Bernardino County, within the Central District of California, defendant VIOREL PRICOP maliciously damaged and destroyed, by means of fire, a vehicle and other personal property used in interstate and foreign commerce, and used in an activity affecting interstate and foreign commerce, namely, a trailer owned by Swift Transportation bearing trailer number SWFZ226484 and the cargo therein.

COUNT FOUR

2 [18 U.S.C. § 844(i)]

On or about February 28, 2022, in San Bernardino County, within the Central District of California, defendant VIOREL PRICOP maliciously damaged and destroyed, by means of fire, a vehicle and other personal property used in interstate and foreign commerce, and used in an activity affecting interstate and foreign commerce, namely, a trailer owned by Swift Transportation bearing trailer number SWFZ131101 and the cargo therein.

COUNT FIVE

[18 U.S.C. § 844(i)]

On or about September 14, 2022, in Riverside County, within the Central District of California, defendant VIOREL PRICOP maliciously damaged and destroyed, by means of fire, a vehicle and other personal property used in interstate and foreign commerce, and used in an activity affecting interstate and foreign commerce, namely, a trailer owned by Swift Transportation bearing trailer number SWFZ176065 and the cargo therein.

FORFEITURE ALLEGATION

[18 U.S.C. §§ 981(a)(1)(C) and 844(c) and 28 U.S.C. § 2461(c)]

- 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of the defendant's conviction of any of the offenses set forth in this Indictment.
- 2. The defendant, if so convicted, shall forfeit to the United States of America the following:
- (a) All right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds traceable to the offenses;
- (b) Any explosive materials involved or used or intended to be used in the offense; and
- (b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).
- 3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of the defendant, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been

substantially diminished in value; or (e) has been commingled with other property that cannot be divided without difficulty. A TRUE BILL Foreperson E. MARTIN ESTRADA United States Attorney SCOTT M. GARRINGER Assistant United States Attorney Chief, Criminal Division SEAN D. PETERSON Assistant United States Attorney Chief, Riverside Branch Office JOHN A. BALLA Assistant United States Attorney Deputy Chief, Riverside Branch Office